
CoC - Code of Conduct

This Code of Conduct defines the principles of AIRtronic GmbH and its employees, which everyone takes into account in their daily work.

It defines the principles and requirements for suppliers and business partners of AIRtronic GmbH with regard to their responsibility for people and the environment.

Suppliers and/or business partners of AIRtronic GmbH undertake to comply with all legally applicable rules and regulations of the countries in which business activities are carried out.

Human rights and labour practices

- **Togetherness, respect and trust**
We respect the personal dignity, privacy and personal rights of every individual. In accordance with our corporate values, honesty, respect and trust towards our employees and external partners are a matter of course for us. We cultivate fair, friendly and constructive cooperation. We also expect this in our cooperation with external partners.
- **Equal treatment and non-discrimination**
We live a culture of equal opportunity and all employees are held in the same esteem. In all employment decisions, employees are treated strictly according to their abilities and qualifications. We do not tolerate discrimination on the basis of ethnic origin, culture, gender, religion, ideology, disability, age or sexual identity.
- **Child labour**
All forms of child labour are to be refrained from. Unless local laws specify higher age limits, no persons younger than 15 years of age will be employed. In countries that fall under the developing country exception of ILO Convention 138, the minimum age may be reduced to 14 years.
- **Occupational health and safety**
A safe and ergonomic working environment must be ensured and preventive health protection measures must be implemented. The applicable occupational health and safety regulations must be complied with. A health-promoting working environment must be ensured and accidents and occupational illnesses must be prevented.
- **Remuneration and working hours**
Adequate remuneration and the statutory minimum wage are guaranteed and the respective applicable national legislation on working time is complied with.
- **Forced labour**
No form of forced labour may take place at our suppliers and business partners and no one may be employed against their will.

Conduct in the business environment

- **Corruption and bribery**
Free and fair competition is the basis of economic activity. Corruption, disloyalty and fraud distort competition. Our business relationships are based on honesty and shall not be distorted or influenced due to bribery or other measures.
No form of corruption or bribery will be tolerated and will not be engaged in, directly or indirectly. No benefits are offered, granted or promised to government officials or private sector counterparties in order to influence official actions or to achieve an unfair advantage.

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- **Free competition**

The supplier and/or business partner shall comply with all applicable competition and antitrust laws and shall not engage in any agreements contrary to antitrust law, such as price-fixing, sharing of markets and customers, market-fixing or bid-rigging, or abuse a possibly existing dominant market position.

- **Money laundering**

Our suppliers and/or business partners have to comply with all relevant legal obligations to prevent money laundering and not engage in money laundering activities.

Dealing with information

- All applicable data protection laws and regulations shall be complied with. Personal data of customers, consumers and employees shall be handled confidentially. Our suppliers and/or business partners shall protect confidential information and use it only in an appropriate manner. They are not authorised to disclose information that is not known to the public.

Environmental protection

- Our suppliers and/or business partners must comply with applicable environmental laws and regulations, develop measures to minimise environmental impacts and continuously improve environmental protection. Furthermore, it is expected that an appropriate environmental management system is established and applied.

Responsible procurement of minerals

- The supplier and/or business partner is responsible for taking appropriate measures to avoid the use in its products of raw materials originating from conflict and risk areas and contributing to human rights violations, corruption, the financing of armed groups or similar negative effects. In the event that a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten, gold or the corresponding ores), AIRtronic GmbH expects that transparency about the supply chain can be ensured upon request.

Supply chain

- AIRtronic GmbH expects from its suppliers and/or business partners that this Code of Conduct with its described principles and requirements is passed on and communicated to its suppliers and subcontractors and also serves as a selection criterion there. Any breach of the obligations set out in the Code of Conduct will be considered an essential contract infringement.